

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Richmond Division

| | | |
|--------------------------|---|----------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | CRIMINAL NO. 3:20CR120-DJN |
| |) | |
| AMANDA ROBINSON, |) | |
| |) | |
| Defendant. |) | |

STATEMENT OF FACTS

The United States and the defendant agree that the factual allegations contained in this Statement of Facts and in Count One of the Criminal Information are true and correct, and that the United States could have proven them beyond a reasonable doubt.

1. On or about June 4, 2020, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, AMANDA ROBINSON, knowingly aimed the beam of a laser pointer at an aircraft, namely a 2006 Cessna, Model 182T, tail number N60430 (“the Aircraft”), and at the flight path of said Aircraft, in the special aircraft jurisdiction of the United States, in violation of Title 18, United States Code, Section 39A.

2. On or about June 4, 2020, police officers of the Metropolitan Aviation Unit were on aerial patrol in the Aircraft, observing civil unrest related activity in Richmond, Virginia. At approximately 0200 hours, while standing at the Robert E. Lee Monument traffic circle, ROBINSON possessed and aimed a green laser pointer at the Aircraft flying above her location. In so doing, ROBINSON struck the Aircraft with the green laser beam on at least two separate occasions disrupting the pilot’s vision.

3. Based on ROBINSON's laser strikes, the police officers utilized an onboard camera to identify ROBINSON as the individual aiming the laser pointer and directed police patrol units to her location. Once police patrol units arrived, ROBINSON was detained and officers recovered a green laser pointer in her possession.

4. At all relevant times, the Aircraft meets the definition of an aircraft under federal law.

5. At all relevant times, the Aircraft was operating in the special aircraft jurisdiction of the United States.

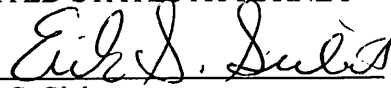
6. At all relevant times, the laser pointer possessed and aimed by ROBINSON at the Aircraft met the statutory definition of a "laser pointer" under federal law.

7. The actions taken by defendant as described above were taken willfully and knowingly. Defendant did not take those actions by accident or mistake. This statement of facts sets forth facts necessary to support defendant's plea of guilty and does not necessarily relate all facts relevant to the charged offense or other persons who may have been involved in the offense.

Respectfully submitted,


G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By:


Erik S. Siebert
Assistant United States Attorney


I have consulted with my attorney regarding this Statement of Facts. I knowingly and voluntarily agree that each of the above-recited facts is true and correct and that had this matter gone to trial the United States could have proven each one beyond a reasonable doubt.

11/23/2020
Date


Amanda Robinson
Defendant

I am counsel for defendant, AMANDA ROBINSON. I have carefully reviewed this Statement of Facts with him and, to my knowledge, his decision to agree to this Statement of Facts is an informed and voluntary decision.

11/23/2020
Date


Jeffrey Everhart
Counsel for Defendant